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14 UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,
22 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR REPLY IN
SUPPORT OF THEIR MOTION FOR
RELIEF FROM AND EMERGENCY
MOTION FOR STAY OF NON-
DISPOSITIVE PRETRIAL ORDER
OF MAGISTRATE JUDGE (DKT.
951)**

I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Portions of Their Reply in
6 Support of Their Motion for Relief from and Emergency Motion for Stay of Non-Dispositive
7 Pretrial Order of Magistrate Judge (Dkt. 951).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Reply in Support of Motion for Relief from and Emergency Motion for Stay ("Reply")	Highlighted Portions	Plaintiff (green)

15 3. The green-highlighted portions of the Reply were designated “Highly
16 Confidential – Attorneys’ Eyes Only” by Waymo in accordance with the Patent Local Rule 2-2
17 Interim Model Protective Order (“Protective Order”), which the parties have agreed governs this
18 case (Transcript of 3/16/2017 Hearing, page 6). Defendants file this material under seal in
19 accordance with Paragraph 14.4 of the Protective Order.

20 4. Defendants' request to seal is narrowly tailored to the portions of the Reply that
21 merit sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this
28th day of July, 2017 at Palo Alto, California.

/s/ Michelle Yang

Michelle Yang

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2 **ATTESTATION OF E-FILED SIGNATURE**
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I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

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6 Dated: July 28, 2017

7 */s/ Arturo J. González*
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Arturo J. González